

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SOLAS OLED LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

CASE NO. 6:19-cv-00537-ADA

JURY TRIAL DEMANDED

**DECLARATION OF JOHN M. GUARAGNA IN SUPPORT OF APPLE INC.'S
MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

I, John M. Guaragna, hereby declare as follows:

1. I am an attorney at DLA Piper LLP (US), counsel of record in this action for Defendant Apple Inc. I am a member of the Bar of the State of Texas and have been admitted to practice before this Court. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. Attached as Exhibit 1 is a true and correct copy of Solas OLED's Board of Directors and staff members listing retrieved on January 17, 2020 from https://www.solasoled.com/our_team.html.

3. Attached as Exhibit 2 is a true and correct copy of Solas OLED's jobs listings retrieved on January 17, 2020 from <https://www.solasoled.com/careers.html>.

4. Attached as Exhibit 3 is a true and correct copy of Google Flights search results from San Francisco, California to Austin, Texas retrieved on January 17, 2020 from <https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSAAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx>

[=2&hl=en&gl=us#flt=SFO./m/0f2rq.2020-02-02*/m/0f2rq.SFO.2020-02-06;c:USD;e:1;s:0*0;sd:1;t:f](https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxxGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=SFO./m/0f2rq.2020-02-02*/m/0f2rq.SFO.2020-02-06;c:USD;e:1;s:0*0;sd:1;t:f).

5. Attached as Exhibit 4 is a true and correct copy of Google Flights search results from San Francisco, California to Dublin, Ireland retrieved on January 17, 2020 from https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxxGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=SFO.DUB.2020-02-02*DUB.SFO.2020-02-06;c:USD;e:1;s:0*0;sd:1;t:f&tcfs=ChkKCC9tLzBkNmxxGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB.

6. Attached as Exhibit 5 is a true and correct copy of Google Flights search results from Waco, Texas to Dublin, Ireland retrieved on January 17, 2020 from https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxxGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=ACT.DUB.2020-02-02*DUB.ACT.2020-02-06;c:USD;e:1;sd:1;t:f&tcfs=ChkKCC9tLzBkNmxxGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB.

7. Attached as Exhibit 6 is a true and correct copy of Google Flights search results from Dallas, Texas to Dublin, Ireland retrieved on January 17, 2020 from https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxxGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=ACT.DUB.2020-02-02*DUB.ACT.2020-02-06;c:USD;e:1;sd:1;t:f&tcfs=ChkKCC9tLzBkNmxxGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB.

[AOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=/m/0f2rq.DUB.2020-02-02*DUB./m/0f2rq.2020-02-06;c:USD;e:1;sd:1;t:f&tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB](https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=/m/0f2rq.DUB.2020-02-02*DUB./m/0f2rq.2020-02-06;c:USD;e:1;sd:1;t:f&tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB)

8. Attached as Exhibit 7 is a true and correct copy of Google Flights search results from Tokyo, Japan to San Francisco, California retrieved on January 17, 2020 from https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=/m/07dfk.SFO.2020-02-02*SFO./m/07dfk.2020-02-06;c:USD;e:1;s:0*0;sd:1;t:f&tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB.

9. Attached as Exhibit 8 is a true and correct copy of Google Flights search results from Tokyo, Japan to Waco, Texas retrieved on January 17, 2020 from https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=/m/07dfk.ACT.2020-02-02*ACT./m/07dfk.2020-02-06;c:USD;e:1;sd:1;t:f&tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB

10. Attached as Exhibit 9 is a true and correct copy of Google Flights search results from Tokyo, Japan to Austin, Texas or retrieved on January 17, 2020 from

https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=/m/07dfk.AUS.2020-02-02*AUS./m/07dfk.2020-02-06;c:USD;e:1;sd:1;t:f&tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB

11. Attached as Exhibit 10 is a true and correct copy of Google Flights search results from Beijing, China to San Francisco, California retrieved on January 17, 2020 from

https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=/m/01914.SFO.2020-02-02*SFO./m/01914.2020-02-06;c:USD;e:1;s:0*0;sd:1;t:f&tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB.

12. Attached as Exhibit 11 is a true and correct copy of Google Flights search results from Beijing, China to Waco, Texas retrieved on January 17, 2020 from

https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=/m/01914.ACT.2020-02-02*ACT./m/01914.2020-02-06;c:USD;e:1;sd:1;t:f&tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB

13. Attached as Exhibit 12 is a true and correct copy of Google Flights search results from Beijing, China to Austin, Texas retrieved on January 17, 2020 from https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=/m/01914.AUS.2020-02-02*AUS./m/01914.2020-02-06;c:USD;e:1;sd:1;t:f&tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB

14. Attached as Exhibit 13 is a true and correct copy of Google Flights search results from Seoul, South Korea to San Francisco, California retrieved on January 17, 2020 from https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=/m/0hsqf.SFO.2020-02-02*SFO./m/0hsqf.2020-02-06;c:USD;e:1;s:0*0;sd:1;t:f&tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB.

15. Attached as Exhibit 14 is a true and correct copy of Google Flights search results from Seoul, South Korea to Waco, Texas retrieved on January 17, 2020 from https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=/m/0hsqf.ACT.2020-02-02*ACT./m/0hsqf.2020-02-06;c:USD;e:1;s:0*0;sd:1;t:f&tcfs=ChkKCC9tLzBkNmxwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSA mAB

[06;c:USD;e:1;sd:1;t:f&tcfs=ChkKCC9tLzBkNmXwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSAAB](https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmXwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSAAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=/m/0hsqf.AUS.2020-02-02*AUS./m/0hsqf.2020-02-06;c:USD;e:1;sd:1;t:f&tcfs=ChkKCC9tLzBkNmXwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSAAB)

16. Attached as Exhibit 15 is a true and correct copy of Google Flights search results from Seoul, South Korea to Austin, Texas retrieved on January 17, 2020 from https://www.google.com/travel/flights?tcfs=ChkKCC9tLzBkNmXwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSAAB&ved=2ahUKEwjGyM7DqYvnAhWPiuwKHWcdCLgQyJABegQIABAN&ictx=2&hl=en&gl=us#flt=/m/0hsqf.AUS.2020-02-02*AUS./m/0hsqf.2020-02-06;c:USD;e:1;sd:1;t:f&tcfs=ChkKCC9tLzBkNmXwGg1TYW4gRnJhbmNpc2NvEi4KCC9tLzBmMnJxEgZEYWxsYXMaGAoKMjAyMC0wMi0wMhIKMjAyMC0wMi0wNiAAOABSAAB

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this declaration was executed this 21st day of January, 2020, in Austin, Texas.

/s/ John M. Guaragna
John M. Guaragna